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April 19, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS  
MDL No. 3080 | Bi-weekly status report

Dear Judge Martinotti:

In addition to appearing before the Court on April 8 and 9, the parties provide the following status update for the weeks of April 8 and 15:

1. Plaintiffs filed their response (ECF No. 142) to the Manufacturer Defendants' request for leave to file a Motion for Judgment on the Pleadings (ECF No. 131).
2. Defendants sent a revised draft of Plaintiffs' proposed Direct Filing Order for the SFP Track. Plaintiffs are reviewing it.
3. The parties negotiated a briefing schedule and structure for additional briefing regarding the ESI Protocol, as requested by Judge Singh.
4. The parties met and conferred regarding a discovery plan on April 5, 2024. Defendants are preparing their response to Plaintiffs' proposal, which they intend to circulate shortly.

Thank you for your continuing attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi  
James E. Cecchi  
Liaison Counsel for  
Third-Party Payer Track

/s/ Joanne Cicala  
Joanne Cicala  
Liaison Counsel for  
The State Attorneys General Track

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/s/ David R. Buchanan

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*Liaison Counsel for*

*Self-Funded Payer Track*

/s/ John D. Tortorella

John D. Tortorella

cc: All counsel of record